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**McGillivary  
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**VIA ECF**

Hon. Dale E. Ho  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application **GRANTED**. The initial pre-trial conference is **ADJOURNED to May 1, 2024, at 11:00 A.M. EST.** The parties shall join the conference by dialing (646) 453 - 4442 and entering the Conference ID: 660 552 069, followed by the pound sign (#). The parties shall file the joint status letter and proposed case management plan by **April 24, 2024**. So Ordered.



Dale E. Ho  
United States District Judge

Dated: January 22, 2024  
New York, New York

Re: *Wynne, et al. v. City of New York*, Case No. 1:23-cv-09955-DEH

Dear Judge Ho,

We represent the Plaintiffs in the above-referenced case and write on behalf of both Parties pursuant to Section 2(e) of Your Honor's Individual Rules and Practices in Civil Cases to jointly request an adjournment of the Initial Pretrial Conference scheduled for February 28, 2024, at 2:30 P.M. as well as the February 21, 2024, deadline to submit a joint status letter and proposed Case Management Plan. *See* Dkt. 20. This is the Parties' first request for an adjournment of these dates.

As noted in the Court's December 8, 2023, Order, this case was referred to mediation through the District's Mediation Program on December 7, 2023, with mediation to take place within 60 days. Dkt. 20. As such, the Court set the Initial Pretrial Conference and corresponding pre-conference submissions deadline to occur more than 60 days after the date of the mediation referral. *Id.* However, due to the availability of both the Parties and the court-appointed mediator, and in consideration of the time required for the Defendant to collect and produce the payroll and timekeeping data necessary to enable the Parties to engage in meaningful settlement negotiations, a mediation session could not be scheduled until April 11, 2024. *See* Jan. 5, 2024, Docket Entry.

The Parties are optimistic that they will be able to resolve the case at or before formal mediation in April 2024. Accordingly, the Parties request that the Initial Pretrial Conference and associated deadlines be adjourned until dates convenient for the Court in May 2024 to enable the Parties to fully explore settlement before engaging in further litigation and to avoid unnecessarily expending the Court's resources.

We thank the Court for its consideration.

Sincerely,

McGILLIVARY STEELE ELKIN LLP



Molly A. Elkin

cc: All counsel (via ECF)